

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

T-MOBILE USA, INC. AND SPRINT CORP.,

Defendants.

Civil Action No. 2:23-CV-00379-JRG-RSP

HEADWATER RESEARCH LLC,

Plaintiff,

v.

T-MOBILE USA, INC. AND SPRINT CORP.,

Defendants.

Civil Action No. 2:23-CV-00377-JRG-RSP

DEFENDANTS' NOTICE PURSUANT TO 35 U.S.C. § 282

Pursuant to 35 U.S.C. § 282(c), Defendants T-Mobile USA, Inc. and Sprint LLC (collectively, "T-Mobile") provide this notice (the "Section 282 Notice") to Plaintiff Headwater Research LLC ("Plaintiff") of patents, publications, other prior art, and witnesses upon which T-Mobile may rely to establish the invalidity and the state of the art as to U.S. Patent Nos. 8,589,541 (the "'541 Patent") and 9,215,613 (the "'613 Patent") (together, the "Asserted Patents").

T-Mobile has already provided the requisite notice through the pleadings and documents filed or served over the course of this litigation, including but not limited to its answer to the complaint, initial disclosures, invalidity contentions, expert reports, discovery responses, fact and expert depositions, trial exhibit lists, trial witness lists, and all documents cited or relied upon therein (collectively, the "Prior Notice"). These pleadings and documents comprising the Prior

Notice include the information that Section 282 requires with respect to the patents, publications, other prior art, and witnesses upon which T-Mobile intends to rely to establish the invalidity and the state of the art as to the asserted claims of the Asserted Patents. T-Mobile therefore incorporates by reference the Prior Notice into this Section 282 Notice as if fully set forth herein. For the same reason, T-Mobile incorporates by reference into this Section 282 Notice all prior art cited or otherwise contained in the prosecution records of the applications that issued as the Asserted Patents, as well as any related applications that were filed in the United States or world.

In addition, T-Mobile identifies the following patents, publications, other prior art, and trial witnesses who may testify in connection with T-Mobile's contentions as to invalidity of the Asserted Patents.

I. Prior Art

A. Patents, Patent Publications, or Patent Applications

| Country | Patent / Publication / Application No. | Date Filed / Published / Issued | Name of Patentee / Applicant |
|----------------|---|--|-------------------------------------|
| U.S. | U.S. Patent Publication No. 2009/0265752 | October 22, 2009, | Sharif-Ahmadi |
| U.S. | U.S. Patent Publication No. 2008/0080458 | April 3, 2008 | Cole |
| U.S. | U.S. Patent Publication No. 2006/0039354 | February 23, 2006 | Rao |
| U.S. | U.S. Patent Publication No. 2008/0084977 | April 10, 2008 | Nayak |
| U.S. | U.S. Patent Publication No. 2010/0017506 | January 21, 2010 | Fadell |
| U.S. | U.S. Patent Publication No. 2009/0207817 | August 20, 2009 | Montemurro |
| U.S. | U.S. Patent Publication No. 2007/0038763 | February 15, 2007 | Oestvall |
| EP | European Patent No. 1,484,871 A1 | December 8, 2004 | Kelz |
| U.S. | U.S. Patent Publication No. 2008/0160958 | July 3, 2008 | Abichandani |
| U.S. | U.S. Patent Publication No. 2009/0217065 | August 27, 2009 | Araujo |

| Country | Patent / Publication / Application No. | Date Filed / Published / Issued | Name of Patentee / Applicant |
|---------|--|---------------------------------|------------------------------|
| U.S. | U.S. Patent Publication No. 2011/0078767 | March 31, 2011 | Cai |
| U.S. | U.S. Patent No. 5,987,611 | November 16, 1999 | Freund |
| U.S. | U.S. Patent Publication No. 2008/0146268 | June 19, 2008 | Gandhi |
| U.S. | U.S. Patent Publication No. 2006/0059556 | March 16, 2006 | Royer |
| U.S. | U.S. Patent No. 8,381,127 | February 19, 2013 | Singh |
| U.S. | U.S. Patent Publication No. 2010/0223096 | September 2, 2010 | Bosan |
| U.S. | U.S. Patent Publication No. 2004/0073672 | April 15, 2004 | Fascenda |
| U.S. | U.S. Patent Publication No. 2007/0156897 | July 5, 2007 | Lim |
| U.S. | U.S. Patent Publication No. 2004/0243682 | December 2, 2004 | Markki |
| U.S. | U.S. Patent Publication No. 2012/0157038 | June 21, 2012 | Menezes |
| U.S. | U.S. Patent Publication No. 2011/0231890 | September 22, 2011 | Torvar |
| U.S. | U.S. Patent Publication No. 2005/0105467 | May 19, 2005 | True |
| U.S. | U.S. Patent Publication No. 2012/0117478 | May 10, 2012 | Vadde |
| U.S. | U.S. Patent Publication No. 2010/0312892 | December 9, 2010 | Woundy |
| U.S. | U.S. Patent No. 9,167,480 | May 17, 2011 | Erman |

B. Other Prior Art

| System, Publication, or Other Document | Bates Beg | Bates End |
|--|----------------|----------------|
| Android Devices, Applications, and Operating Systems | N/A | N/A |
| A T-Mobile G1 device | N/A | N/A |
| An HTC Nexus One device | N/A | N/A |
| An HTC Hero device | N/A | N/A |
| A T-Mobile myTouch 3G device | N/A | N/A |
| Android OS Version 1.6, R1 | TMO_HW50000222 | TMO_HW50000222 |
| Android OS Version 1.6, R2 | TMO_HW50000223 | TMO_HW50000223 |

| System, Publication, or Other Document | Bates Beg | Bates End |
|--|----------------------|----------------------|
| Google I/O Presentation “Coding for Life – Battery Life, That Is” (Slides) | GOOG-HDWTER-0000001 | GOOG-HDWTER-0000032 |
| Google I/O Presentation “Coding for Life – Battery Life, That Is” (Video) | GOOG-HDWTER-00000033 | GOOG-HDWTER-00000033 |
| Gmail | N/A | N/A |
| JuiceDefender | N/A | N/A |
| J. Walton, DroidDog, App(s) Review: JuiceDefender & UltimateJuice | TMO_HW50000130 | TMO_HW50000132 |
| K. Purdy, LifeHacker, JuiceDefender Saves Batteries by Automating Android Data | TMO_HW00043538 | TMO_HW00043542 |
| Latedroid, JuiceDefender – Battery Saver | TMO_HW50000461 | TMO_HW50000468 |
| Latedroid, JuiceDefender Changelog | TMO_HW50000469 | TMO_HW50000473 |
| Latedroid, JuiceDefender | TMO_HW50000478 | TMO_HW50000506 |
| D. Ruddock, Android Policy, Top Android Apps Every Rooted User Should Know About, Part 1: Apps 1-8 | TMO_HW00043520 | TMO_HW00043537 |
| HTC Dream/T-Mobile G1 User Guide | TMO_HW00044067 | TMO_HW00044207 |
| T-Mobile myTouch 3G Slide Manual | TMO_HW00043878 | TMO_HW00044059 |
| Motorola Droid User Guide | TMO_HW00043380 | TMO_HW00043437 |
| HTC Nexus One User’s Guide | TMO_HW00043544 | TMO_HW00043877 |
| T-Mobile G1 Full Phone Specifications | TMO_HW00043266 | TMO_HW00043267 |

| System, Publication, or Other Document | Source |
|---|---|
| Bharti Kalra & D. K. Chauhan, A Comparative Study of Mobile Wireless Communication Network: 1G to 5G, 2 Int’l J. Comput. Sci. & Info. Tech. Rsch., 430 (2014) | https://www.researchgate.net/publication/318673817_A_Comparative_Study_of_Mobile_Wireless_Communication_Network_1G_to_5G |

| System, Publication, or Other Document | Source |
|--|---|
| Overview of Cellular Mobile Network Standards, 1NCE | https://1nce.com/en-us/resources/news/blog/cellular-mobile-standards |
| Mobile Communications Standard, Everphone | https://everphone.com/en/wiki/mobile-communications-standard |
| Shanzhi Chen, Jian Zhao, & Ying Peng, The Development of TD-SCDMA 3G to TD-LTE-Advanced 4G from 1998 to 2013, 21 IEEE Wireless Communications 167 (2014) | https://www.researchgate.net/publication/273191880_The_development_of_TD-SCDMA_3G_to_TD-LTE-advanced_4G_from_1998_to_2013 |
| Adnan Ghayas, 3G UMTS Networks: What Is UMTS And Why Does It Use WCDMA, COMSBRIEF (2021), | https://commsbrief.com/3g-umts-networks-what-is-umts-and-why-does-it-use-wcdma/ |
| IP Europe, What Are Cellular Communications Standards? | https://ipeurope.org/policy/europes-open-standards-development-model/what-are-cellular-communications-standards/ |
| R. Gazzo, Timeline from 1G to 5G: A Brief History on Cell Phones, CENG | https://www.cengn.ca/information-centre/innovation/timeline-from-1g-to-5g-a-brief-history-on-cell-phones/ |
| Julie McDaniel, Unraveling the Wireless Future: What is a Wireless WAN (WWAN)?, Perle (May 22, 2024), | https://www.perle.com/articles/what-is-a-wireless-wan-wwan.shtml |
| Nisarg Gandhewar & R. Sheikh, Google Android: An Emerging Software Platform For Mobile Devices, Int. J. Comput. Sci. Eng. (2009) | https://www.researchgate.net/publication/313558348_Google_android_An_emerging_software_platform_for_mobile_devices |
| Reto Meier, Google I/O 2010 – A Beginner’s Guide to Android, YouTube | https://www.youtube.com/watch?v=yqCj83leYRE |
| Pocketnow, Android Quick Tip: Data Roaming, YouTube | https://www.youtube.com/watch?v=bnrKr9XINRQ |
| Virgil Dobjanschi, Google I/O 2010 - Android REST Client Applications, YouTube | https://www.youtube.com/watch?v=xHXn3Kg2IQE |

II. Persons To Be Identified Under 35 U.S.C. § 282(c)

| Name | Address |
|--------------------|--|
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| Amith Yamasani | 1600 Amphitheatre Pkwy. Mountain View, CA 94043 |
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| Jeffrey Sharkey | N/A |

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T-Mobile reserves the right to supplement or to modify this Section 282 Notice through and including the time of trial.

Dated: May 23, 2025

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CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2025, the foregoing was served upon all counsel of record who have consented to electronic service.

/s/ Josh A. Krevitt

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